

Sealed

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United States Courts
Southern District of Texas
FILED

April 25, 2024

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

MAXWELL SCHUTLZ

Defendant

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§
§

Criminal No. 4:24-cr-00212

UNDER SEAL

MOTION TO SEAL

COMES NOW the United States through its undersigned attorney and respectfully requests the Court to enter an Order directing the Clerk of Court to seal the Indictment, this Motion to Seal, and the Order to Seal in the above-captioned case. The United States requests the above-referenced Indictment be sealed because premature notice of the Indictment would potentially jeopardize the ability to obtain the arrest and appearance of the defendant and provide them an opportunity to flee the jurisdiction of this Court. It is further requested that upon the arrest of the defendant, the Indictment be automatically unsealed without need of a further motion to unseal.

WHEREFORE, PREMISES CONSIDERED, the United States respectfully requests the Court seal the above-referenced Indictment, this Motion to Seal and Order to Seal, and that no person shall have access to same except the Clerk or his designated deputies, attorneys for the United States, and authorized representatives

of the Federal Bureau of Investigation.

Respectfully submitted,

ALAMDAR S. HAMDANI
United States Attorney

By: /s/ Rodolfo Ramirez
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